

1 LYSSA S. ANDERSON
Nevada Bar No. 5781
2 KRISTOPHER J. KALKOWSKI
Nevada Bar No. 14892
3 KAEMPFER CROWELL
1980 Festival Plaza Drive, Suite 650
4 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
5 Fax: (702) 796-7181
landerson@kcnvlaw.com
6 kkalkowski@kcnvlaw.com
Attorneys for Defendants
7 *Las Vegas Metropolitan Police Department,*
Vanessa Mitchell, and Don'te Mitchell

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 MARY SMITH, individually, and as Special
Administrator of the Estate of JAMES PEREA,

12 Plaintiffs,

13 vs.

14 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT; WELLPATH, LLC; RN
15 RACHEL CLARK; RN TANJA
WASIELEWSKI; RN GENEVA BESSIE;
16 LCSW SANDRA CELIS; MA/LNA MELEKA
ST. JOHN. RN STEPHANIE ESTALA; NP
17 HUGH ANDREW ROSSET; NP SHELLEY
AMEDURI; PA ANDREA BALOGH; RN
18 AYNUR KABOTA; CORRECTIONS
OFFICER VENESSA MITCHELL;
19 CORRECTIONS OFFICER DON'TE
MITCHELL; CORRECTIONS OFFICER
20 JOSHUA WALDMAN; DOES 1-30,

21 Defendants.

Case No.: 2:23-cv-00092-JAD-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR LVMPD
DEFENDANTS TO FILE REPLIES IN
SUPPORT OF THE MOTIONS FOR
SUMMARY JUDGMENT (Second
Request)
[ECF Nos. 143, 144]**

22 Pursuant to Local Rule 6-1, Mary Smith, individually and as Special Administrator of the
23 Estate of James Perea ("Plaintiffs"), Las Vegas Metropolitan Police Department, Vanessa
24 Mitchell, and Don'te Mitchell ("LVMPD Defendants"), stipulate, agree, and request that the Court

1 extend the deadline for LVMPD Defendants to file their Replies in support of the pending Motions
 2 for Summary Judgment, (ECF Nos. 143, 144), from the current date of June 23, 2025, for an
 3 additional 7 days, to Monday, June 30, 2025.¹ The parties agree that good cause supports the
 4 minimal extension of the briefing schedule based on counsel for LVMPD Defendants being out of
 5 the office between June 19 and 20, 2025, and in order to thoroughly address all issues raised in
 6 Plaintiffs' Responses. The brief extension will not prejudice any parties.

7 DATED this 18th day of June, 2025.

DATED this 23rd day of June, 2025.

8 By: /s/ Lyssa S. Anderson
 9 Lyssa S. Anderson (SBN 5781)
 10 Kristopher J. Kalkowski (SBN
 11 14892)
 12 1980 Festival Plaza Drive, Suite 650
 13 Las Vegas, Nevada 89135
 14 *Attorneys for LVMPD Defendants*

By: /s/ Peter Goldstein
 Peter Goldstein (SBN 6992)
 10161 Park Run Drive, Suite 150
 Las Vegas, Nevada 89145
 Clyde Rastetter
 199 Cook Street, Suite 308
 Brooklyn, NY 11206
Attorney for Plaintiffs

13 **IT IS SO ORDERED.**

14 DATED this 25th day of June, 2025.

15
 16 
 17 UNITED STATES DISTRICT JUDGE

18
 19
 20
 21
 22
 23 ¹ Wellpath, LLC, Rachel Clark, Tanja Wasielewski, Geneva Bessie, Sandra Celis, Meleka St.
 24 John, Stephanie Estala, Hugh Andrew Rosset, Shelley Ameduri, and Andrea Balogh ("Wellpath
 Defendants") are not included in this Stipulation because the bankruptcy stay has only been lifted
 as to LVMPD Defendants and Plaintiffs. *See* (Order, ECF No. 140).